

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

EMMA KOE et al.,

Plaintiffs,

v.

CAYLEE NOGGLE et al.,

Defendants.

Civil Action No. 1:23-cv-02904-SEG

DEFENDANTS' RESPONSE TO MOTION TO INTERVENE
AS PLAINTIFF BY NANCY DOE

On July 5, 2023, Nancy Doe, individually and on behalf of her minor daughter Linda Doe, moved to intervene as a plaintiff in this case. *See* ECF 57. Defendants do not oppose Ms. Doe's intervention so long as she does not seek to modify the agreed-upon briefing and hearing schedule already in place. *See* Order, ECF 68. Moreover, although Defendants do not oppose permissive intervention, they reserve all rights to challenge intervenors' standing, including the imminence of the alleged injury.

Respectfully submitted this 14th day of July, 2023.

Jeffrey M. Harris*
Cameron T. Norris*
Tiffany H. Bates*
Consovoy McCarthy PLLC
1600 Wilson Blvd., Suite 700
Arlington, VA 22209
(703) 243-9423
jeff@consovoymccarthy.com
cam@consovoymccarthy.com
tiffany@consovoymccarthy.com

Patrick Strawbridge*
Consovoy McCarthy PLLC
Ten Post Office Square
8th Floor South PMB #706
Boston, MA 02109
(617) 227-0548
patrick@consovoymccarthy.com

**pro hac vice motions pending*

/s/ Stephen J. Petrany
Christopher M. Carr
Attorney General
Georgia Bar No. 112505
Stephen J. Petrany
Solicitor General
Georgia Bar No. 718981
Ross W. Bergethon
Principal Deputy Solicitor General
Georgia Bar No. 054321
Georgia Department of Law
40 Capitol Square SW
Atlanta, Georgia, 30334
404-458-3408
spetrany@law.ga.gov

Attorneys for Defendants

CERTIFICATE OF SERVICE

I hereby certify that, on July 14, 2023, I electronically filed the foregoing with the Court and served it on opposing counsel through the Court's CM/ECF system. All counsel of record are registered ECF users.

/s/ Stephen J. Petrany